

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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April 2, 2003

BY E-MAIL AND
FIRST CLASS U.S. MAIL

James Avery, Esq.
Brown, Rudnick, Berlack, & Israels LLP
One Financial Center
Boston, MA 02111

Re: Berkshire Gas Company, D.T.E. 03-11

Dear Mr. Avery:

Enclosed is the First Set of Information Requests by the Department of Telecommunications and Energy to Berkshire Gas Company regarding the captioned matter. Please submit copies of the Company's responses to the information requests to the Department by 5:00 p.m., April 16, 2003.

Should you have any questions please contact me at (617) 305-3762. Thank you for your prompt attention to this matter.

Sincerely,

Jody Stiefel
Hearing Officer

Enc.
cc: Mary Cottrell, Secretary

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. 03-11

**FIRST SET OF INFORMATION REQUESTS TO
BERKSHIRE GAS COMPANY**

The Department of Telecommunications and Energy ("Department") submits to Berkshire Gas Company ("Company") the following Information Requests.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request refers to the Company's 2002 Service Quality ("SQ") report filed on March 3, 2003 ("Filing").
2. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer. Provide electronic versions of all your responses including all calculations and worksheets. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed **but no later than April 16, 2003**.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or their witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "**historical data**" refers to data for the years **1992 through 2001**.
5. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
6. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

7. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
8. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department; also submit four (4) copies of the responses to Jody M. Stiefel, Hearing Officer, and (2) copies to Glenn Shippee, Rates and Revenue Requirements Division.

Requests

- DTE 1-1 Please refer to the Company's Filing at I-1. Explain why the Company has less than 3 years of data for Telephone Answering Factor for calls handled within 40 seconds and for calls handled within 45 seconds.
- DTE 1-2 Please refer to the Company's Filing at I-1. Provide evidence to support Berkshire's claim that the "Company was not able to collect [Service Appointments Met] data accurately until early 2002 with the resolution of certain software concerns." In your response, please provide all correspondence between Company staff and Company management (e.g., memos, letters, e-mail, etc.) that show that Berkshire had problems collecting these data, including a detailed description of the "software concerns" that affected the collection of the data. Also provide the raw data (e.g., log book entries, etc.) that show that Berkshire achieved 100 percent performance with respect to Service Appointments Met in 2002.
- DTE 1-3 Please refer to the Company's Filing at I-1. Explain why Berkshire has only two years of data on On-Cycle Monthly Meter Reads.
- DTE 1-4 Please refer to the Company's Filing at I-1. For the following measures, explain why Berkshire calculated its benchmarks using interval estimates instead of point estimates:
- (A) On-Cycle Monthly Meter Reads;
 - (B) Consumer Division Cases;
 - (C) Billing Adjustments;
 - (D) Lost Time Accident Rate;
 - (E) Unaccounted for Gas.
- DTE 1-5 Please refer to the Company's Filing at III-1. Explain why Berkshire answered only 58.68 percent of the total telephone calls, and 57.38 percent of non-emergency telephone calls, within 20 seconds, in September 2002.
- DTE 1-6 Please detail the internal audits for each SQ penalty measure and reporting requirement that have been conducted to assure the accuracy of Company data.

If internal audits have not been performed, please describe the Company's plans to perform such audits.

DTE 1-7 Please explain how each of the following SQ measures was recorded and measured:

- (a) Telephone Answering Factor;
- (b) Emergency Answering;
- (c) Service Appointments Kept;
- (d) Meter Reads;
- (e) Bill Adjustments;
- (f) Lost Time Accident Rate;
- (g) Response to Odor Calls;
- (h) Restricted Work Day Rate;
- (I) Unaccounted for Gas; and,
- (j) Restricted Work Day Rate.

In your response, indicate if the Company faced any recording and measurement issues and how they were resolved. Provide documentation to support your answer.